

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

IN RE: JOHN W. GWYNN, JR.

CHAPTER 13
CASE NO. 10-62676

Debtor(s)

MOTION FOR APPROVAL OF LOAN MODIFICATION

Comes now, *John Gwynn, Jr.*, Debtor(s), and move the Court for approval of a loan modification, and in support thereof states unto the Court as follows:

Your Debtors filed a Chapter 13 bankruptcy proceeding in this Court on *September 17, 2010*, and the Chapter 13 Plan has been confirmed by the Chapter 13 Trustee.

As of the present time, the Debtor(s) is not in default.

That your Debtor(s) desire to enter into a loan modification, the terms of which are as follows:

The Debtors wish to enter into a loan modification for real property known as *151 Bell Court, Danville, VA*. The total amount to be financed is approximately *\$119,585.61* with an interest rate of approximately *6.00%* and approximately *360* monthly payments of approximately *\$743.85*.

That your Debtor(s) believe that incurring the new indebtedness is necessary and proper, that your Debtor(s) are able to repay said indebtedness upon the terms set forth hereinabove. The Debtor(s) do not feel this will be a burden on their finances and are requesting your permission to obtain this loan modification.

That the Debtor(s) agree that their Attorney is due additional fees in the amount of \$250.00 for the preparation of the Motion for Approval of Loan Modification and Notice of Hearing.

WHEREFORE, your Debtor(s) respectfully request the Court to authorize your Debtors to enter into a loan modification described hereinabove for the purposes previously stated and that said attorney fees shall be paid by the Chapter 13 Trustee.

Dated: 10/21/2013

JOHN W. GWYNN, JR.

Stephen E. Dunn, Esq.
201 Enterprise Drive
Suite A
Forest, VA 24551

/s/ Stephen E. Dunn

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**NOTICE OF HEARING ON DEBTORS MOTION FOR
APPROVAL OF LOAN MODIFICATION**

Please take notice that Counsel for the above-named Debtor(s) filed a Motion for Approval of Loan Modification, true copies of which are attached hereto, and shall submit the same to the Honorable U.S. Bankruptcy Judge, for approval on *November 13, 2013* at 10:00 am., or as soon thereafter as the parties may be heard, in the U.S. Bankruptcy Court, 700 Main Street, Danville, Virginia.

Objections to the Motion must be filed in writing, with copies thereof served on the Trustee and Counsel for the Debtor(s) no later than five days prior to the hearing date in order to be heard on *November 13, 2013*.

I do hereby certify that a copy of this Notice and Motion have been forwarded to the Chapter 13 Trustee, the Debtor, and all affected creditors in this case on the after mentioned date.

Dated: 10/21/2013

JOHN W. GWYNN, JR.

/s/ Stephen E. Dunn
Of Counsel

Stephen E. Dunn, Esq.
201 Enterprise Drive
Suite A
Forest, VA 24551
Counsel for Debtor(s)